

EXHIBIT D

Marshall Beil (MB-0992)
McGUIREWOODS LLP
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212 548 7004
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B. Trent Webb (admitted *pro hac vice*)
Adam P. Seitz (admitted *pro hac vice*)
Jennifer Riggs (admitted *pro hac vice*)
Beth Larigan (admitted *pro hac vice*)
SHOOK, HARDY & BACON LLP
2555 Grand Blvd.
Kansas City, Missouri 64108-2613
816-474-6550

Attorneys for Nike, Inc.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
DIPLOMATIC MAN, INC., : Civil Action No. 08 Civ 0139 (GEL)

Plaintiff, ::
:
vs. : **SUPPLEMENTAL DECLARATION**
:
NIKE, INC., : **OF B. TRENT WEBB IN SUPPORT**
:
:
Defendant, Counter-: **OF DEFENDANT NIKE, INC.'S**
Claimant and Third-: **MOTION FOR COSTS AND**
Party Plaintiff, : **ATTORNEY'S FEES AGAINST**
:
vs. : **PLAINTIFF DIPLOMATIC MAN,**
:
:
LaRON JAMES a/k/a JUELZ SANTANA and::
SANTANA'S WORLD, :
:
Third-Party
Defendants.

----- X

I, B. Trent Webb, having personal knowledge of the facts stated below, and under penalty of perjury, hereby declare that:

1. I am a partner with the law firm of Shook, Hardy & Bacon, L.L.P. (“SHB”) in Kansas City, Missouri and chair of the firm’s Intellectual Property Technology & Litigation Practice. I am lead counsel for defendant Nike, Inc. (“Nike”) in this litigation.

2. I submit this declaration in furtherance of Nike, Inc.’s Motion for Costs and Attorney’s Fees Against Plaintiff Diplomatic Man, Inc. and pursuant to the Court’s Order dated April 6, 2009, directing Nike to submit supporting documentation by April 13, 2009, for all costs and fees incurred through December 2008 (Doc. 48).

3. Exhibit A includes a summary of both SHB’s attorney’s fees and expenses in connection with this case from November 2008 through December 2008, which also includes redacted daily time entries that I and other legal professionals submitted for each month. These billing records show the amount of time spent by each legal professional on this matter.

4. The total legal fees billed to, and paid by, Nike on these two invoices are \$75,450.50. Expenses total \$1,925.80. The combined total is \$77,376.30.

5. It is my belief that the total amount of work performed on these invoices as well as the resulting fees and expenses SHB charged were both necessary and reasonable in order to successfully defend this action.

Executed on this 13th day of April.



B. Trent Webb

EXHIBIT A

SHOOK, HARDY & BACON L.L.P.
Attorneys at Law
Attn: Accounting
PO Box 413635
Kansas City, Missouri 64141-3635
Federal I.D.: 44-0585497

December 17, 2008

NIKE INC
ONE BOWERMAN DR
BEAVERTON OR 97005-0979

Invoice:1436727

(816) 474-6550

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

Cameron Giles a/k/a Cam'Ron , LaRon Louis James NIKE.139797 BTW

Total Fees Due \$37,113.00

Total Expenses \$608.99

TOTAL AMOUNT DUE \$37,721.99
=====

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Cameron Giles a/k/a Cam'Ron , LaRon Louis James
a/k/a Jueiz Santana

NIKE.139797 BTW

For Professional Services Rendered through 11/30/08

HOURS

11/03/08 JSK	Review spreadsheets and damages information provided by Nike and prepare for conference call with Forbes Campbell. Participate in conference call regarding REDACTED Review information disclosed to Plaintiff regarding gross profits. Work to prepare new spreadsheet of information regarding gross profits of the AF25 shoes. Review new advertising cost and briefing information received from client.	4.50
11/03/08 MDDX	Review and analyze sales data received from the client and prepare summary per the request of Ms. Riggs in anticipation of production to opposing counsel.	3.00
11/04/08 JSK	Work on separating sales spreadsheet into shoes and apparel and specific styles. Continue to review Campbell documents to prepare for discovery. Begin a log of discovery documents.	4.30
11/04/08 MDDX	Review and analyze sales data received from the client and prepare summary per the request of Ms. Riggs in anticipation of production to opposing counsel.	2.50

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11/04/08 MDDX	Review and analyze documents produced by Nike per the request of and in preparation for review by Ms. Riggs.	.50
11/05/08 JSK	Continue to work on log of discovery documents. Continue to work on spreadsheets of gross sales. Continue to work on review of Campbell documents for discovery. Review information received from client regarding COGs.	6.10
11/05/08 BALX	Review and analyze correspondence from Ms. Riggs and documents/spreadsheets from Nike regarding revenues from Air Force 25 product line and cost of goods sold; conference with Ms. Riggs about her interview of Forbes Campbell regarding these documents and about production of same to Plaintiff.	1.00
11/05/08 BALX	Conferences with Mr. Zerger and Ms. Riggs regarding factors involved in cost of goods sold, including FOB, duty, freight, and miscellaneous charges.	.40
11/05/08 BALX	Research whether voluntary production of a condensed spreadsheet created by SHB would result in subject matter waiver of the work product privilege; draft short memorandum to Ms. Riggs regarding same; confer with Ms. Riggs and Mr. Seitz regarding waiver issue.	2.10
11/05/08 BALX	Review and analyze budget documents that include All-Star Weekend costs; analyze same with Ms. Riggs.	.30
11/05/08 BALX	Review and analyze Wieden + Kennedy documents to determine scope of documents and advertising costs; conference with Ms. Riggs regarding same.	.70
11/05/08 BALX	Review letter from counsel for ASCAP, Mr. Majeske, regarding subpoena duces tecum; telephone call to and email to Mr. Majeske regarding same.	.40
11/05/08 BALX	Telephone calls to Mr. Gawley and Ms. Miller, counsel for Island Def Jam and Universal Music Group, regarding subpoenas duces tecum served on the companies.	.60

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11/05/08	MDDX	Review and analyze Nike documents per the request of and in preparation for review by Ms. Riggs.	1.20
11/06/08	JSK	Draft and send e-mail to client regarding REDACTED Continue to work on discovery log and review of Campbell documents.	3.90
11/06/08	BALX	Telephone conference with counsel for Island Def Jam and Universal Music Group regarding their agreement to comply with the subpoenas duces tecum and our agreement to extend the deadline for compliance; correspond with Mr. Seitz and Ms. Riggs regarding same.	.30
11/06/08	BALX	Correspond with counsel for Island Def Jam and Universal Music Group confirming their agreement to comply with the subpoenas duces tecum and extension of the deadline for compliance, and requesting early production of the Recording Agreement between Roc-A-Fella Records and Diplomatic Man.	.20
11/07/08	BTW	Conference with Mr. Seitz regarding license and release issues; review documents; attorney conference regarding upcoming tasks.	1.10
11/10/08	JSK	Review Nike financials to determine what supplemental information we will need to provide to Plaintiff regarding gross sales; review e-mail responses from client regarding REDACTED draft of spreadsheet covering just shoe sales; look at disclosures to compare.	2.50
11/11/08	JSK	Continue to work on updating discovery response answers with Campbell documents. Meeting with Beth Larigan to discuss financials and plan of action for discovery responses.	6.10
11/12/08	JSK	Continue review of documents for production/non-responsiveness; telephone call to Bob Kohn regarding expert report. Review documents collected to produce to Bob Kohn, confirm address, send documents to expert for review.	4.90
11/12/08	BALX	Communicate with counsel for ASCAP regarding compliance with subpoena duces tecum.	.30

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11/12/08 MDDX	Review and analyze documents and pleadings filed in this case in preparation for forwarding to Expert Robert Kohn per the request of Ms. Riggs.	3.00
11/13/08 JSK	Continue working on updated discovery chart. Review correspondence from client regarding REDACTED	4.50
11/13/08 BALX	Telephone call to counsel for ASCAP regarding compliance with subpoena duces tecum.	.10
11/13/08 BALX	Conference with Ms. Riggs regarding additional sales data from Forbes Campbell.	.30
11/13/08 BALX	Review and analyze information received from Forbes Campbell explaining sales data; conferences with Ms. Riggs and Mr. Zerger regarding sales data and the sources of same.	.90
11/17/08 JSK	Prepare for teleconference with client to discuss REDACTED Hold teleconference with client to discuss REDACTED Continue review of Campbell documents and document log for production.	5.50
11/17/08 BALX	Communicate with Mr. Seitz and Ms. Riggs regarding motion for extension of pre-trial deadlines.	.20
11/17/08 BALX	Communicate with counsel for ASCAP regarding compliance with subpoena duces tecum.	.20
11/17/08 BALX	Conference with Mr. Seitz regarding strategy and preparation of motion for extension of pre-trial deadlines; begin drafting motion for extension.	1.70
11/18/08 JSK	Communicate via e-mail with clients regarding REDACTED Continue document review and draft of document log.	6.30
11/18/08 APS	Work on discovery issues and summary judgment; meeting with Ms. Larigan and Ms. Riggs regarding same.	1.50

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11/18/08 BALX	Conference with Mr. Seitz and Ms. Riggs regarding motion for extension of pre-trial deadlines, service of deposition notices and subpoenas, motion to compel, and supplemental disclosures to produce to Plaintiff.	.30
11/18/08 BALX	Finalize motion for extension of pre-trial deadlines.	2.30
11/18/08 BALX	Conference call with Jennifer Riggs, Carolyn Gutsick and Forbes Campbell regarding Nike's sales revenue data.	.30
11/18/08 BALX	Communicate with counsel for ASCAP and Island Def Jam Music Group regarding compliance with subpoena and production of responsive documents; telephone conference with counsel for ASCAP regarding formal service of revised subpoena; draft new subpoena, notice of subpoena, and letter to ASCAP's counsel enclosing same; correspond with Mr. Beil regarding service of subpoena on ASCAP.	2.20
11/18/08 BALX	Review and analyze Agreement between Island Def Jam Music Group and Diplomatic Man, Inc. and Amendment thereto; communicate with Mr. Seitz and Ms. Riggs regarding copyright rights under the Agreement and Diplomatic Man's possible lack of standing.	.90
11/19/08 BTW	Conference with Mr. Seitz regarding status and depositions; review materials regarding making of video.	.60
11/19/08 JSK	Meeting with Adam Seitz to discuss conference with Bob Kohn. Finalize Kohn outline for conference. Participate in conference call with Bob Kohn to discuss his initial opinions. Update Kohn outline after conference call. Send e-mail to Kohn regarding sale of Juelz Santana to IDJ. Work with document production group to prepare documents for production. Continue review of documents and draft of document log for production.	6.00
11/19/08 APS	Telephone conference with Mr. Cinque regarding extension and discovery issues; prepare for and participate in telephone conference with Mr. Kohn regarding expert report.	2.10

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11/19/08 BALX	Conference with Mr. Seitz regarding proposed modifications to Scheduling Order; draft proposed schedule to send to Plaintiff's counsel for his review and approval; conference with Ms. Riggs and Mr. Seitz regarding exclusive and non-exclusive license issues; continue drafting motion for summary judgment on license issue; work with Ms. Deaton to serve Notice of Subpoena to ASCAP on Plaintiff's counsel; conference with Ms. Riggs regarding meeting with expert Bob Kohn; research Internet articles to forward to expert regarding Cam'ron's sales of Juelz Santana's contract to Island Def Jam.	2.20
11/19/08 BALX	Review and analyze article regarding sound recording public performance royalties for non-interactive digital transmissions; draft subpoena duces tecum and letter to SoundExchange, Inc., the nonprofit entity that collects and distributes such royalties; arrange for service of same.	1.00
11/19/08 MDDX	Review and analyze Nike documents in preparation for production per the request of Ms. Riggs.	3.50
11/20/08 JSK	Continue working on updated discovery chart. Continue document review.	4.00
11/20/08 MDDX	Draft, edit and serve Notice of Subpoena to opposing counsel per the request of Ms. Larigan.	.50
11/21/08 JSK	Continue to work on document review and discovery chart/document log for production.	1.20
11/21/08 MDDX	Review and analyze Nike documents in preparation for production per the request of Ms. Riggs.	.50
11/24/08 JSK	Finish review of client documents; finalize document log; prepare documents for production.	5.80
11/24/08 APS	Telephone conference with Mr. Cinque regarding extension and discovery issues.	.30

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11/24/08 BALX	Multiple communications with counsel for Sound Exchange, Inc. regarding its compliance with subpoena duces tecum and regarding protective order governing case.	.70
11/24/08 MDDX	Review and analyze Nike documents in preparation for production per the request of Ms. Riggs.	6.30
11/25/08 BTW	Conference with Mr. Seitz regarding withdrawal; review deposition correspond; conference with Mr. Seitz regarding strategy for going forward.	1.10
11/25/08 JSK	Work with document production team to get documents ready for production; review file for financials that conflict with newly discovered document; listen to voice mail from Cinque & Cinque discussing their desire to withdraw as Plaintiff's counsel. Review motion to withdraw. Team meeting to discuss response and strategy for moving forward. Review file for all delinquent letters and e-mails sent to plaintiff regarding discovery deficiencies. Begin draft of statement in response.	8.20
11/25/08 APS	Multiple telephone conferences with Mr. Cinque regarding withdrawal; correspondence with Ms. Davis regarding same; meeting with Mr. Webb regarding response; research regarding failure to prosecute.	2.00
11/25/08 BALX	Conference with Mr. Seitz, Ms. Riggs, and Mr. Beil regarding Plaintiff's counsel's decision to withdraw and strategy for proceeding; conduct research to determine whether we can assert a claim for failure to prosecute in response to Plaintiff's counsel's anticipated motion to withdraw.	1.50
11/25/08 MDDX	Draft and edit privileged log in preparation for production per the request of Ms. Riggs.	2.00
11/25/08 MDDX	Review and analyze document production from Universal Musical Group in preparation for review by attorneys.	.50
11/25/08 RLV	Saving Third Party Docs Produced.	1.50

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11/26/08 BTW	Review filings from opposing counsel; conference with Mr. Seitz regarding same; study and revise response to same.	1.60
11/26/08 JSK	Continue to work on draft of Statement in Response to Cinque's Motion to Withdraw. Draft declaration in support of Nike's Statement in Response. Edit and finalize declaration and response. Prepare documents to be filed.	6.20
11/26/08 APS	Finalize response to Mr. Cinque's motion to withdraw as counsel; multiple conferences with Mr. Beil regarding same; correspondence with Ms. Davis regarding same; telephone conference with Mr. Baldonado regarding status of case.	3.20
11/26/08 BALX	Review and analyze Cinque's motion to withdraw and supporting papers; conferences with Ms. Riggs regarding statement in response to same; conduct research to determine whether we can assert a claim for sanctions for Plaintiff's failure to respond to discovery and discuss with Ms. Riggs how to set up such a claim in the statement in response to Cinque's motion to withdraw.	1.20
11/26/08 BALX	Review and analyze documents produced by Universal Music Group and Island Def Jam; draft correspondence to counsel for Universal Music Group regarding lack of records produced in response to subpoena and requesting documents and/or a deposition identifying time period during which the Juelz Santana Recording Agreement was in effect.	2.60
11/26/08 BALX	Revise and finalize Response to Cinque's motion to withdraw and Declaration of Jennifer K. Riggs in support of same.	1.50
11/26/08 MDDX	Review and analyze response to Motion for attorney withdraw and prepare exhibits per the request of Ms. Riggs.	1.50

Mr. Webb	4.40 hours at	\$470.00 =	2068.00
Ms. Knapp Riggs	80.00 hours at	\$275.00 =	22000.00
Mr. Seitz	9.10 hours at	\$290.00 =	2639.00
Ms. Larigan	26.40 hours at	\$240.00 =	6336.00
Ms. Deaton	25.00 hours at	\$155.00 =	3875.00
Ms. Whitaker	1.50 hours at	\$130.00 =	195.00

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Total Fees Due \$37,113.00

EXPENSES

11/21/08	Commerce Bank: New Jersey business reports	15.00
11/06/08	Hatfield Process Service: Service Upon Thomson Compumark	170.00
10/31/08	Imaging Services	26.18
11/19/08	Photocopies	2.40
11/26/08	Photocopies	1.44
11/05/08	Long Distance Beth Larigan to 2123338534	2.45
11/19/08	Long Distance Adam Seitz to 4086025646	9.10
11/25/08	Long Distance Adam Seitz to 2125487004	4.90
11/12/08	Delivery--Federal Express	27.52
11/30/08	Copyright Office-- Copy of sound recording, 10/6/08	350.00

Total Expenses \$608.99

TOTAL AMOUNT DUE \$37,721.99
=====

SHOOK, HARDY & BACON L.L.P.
Attorneys at Law
Attn: Accounting
PO Box 413635
Kansas City, Missouri 64141-3635
Federal I.D.: 44-0585497

January 30, 2009

NIKE INC
ONE BOWERMAN DR
BEAVERTON OR 97005-0979

Invoice:1440815

(816) 474-6550

REMITTANCE COPY - PLEASE RETURN WITH PAYMENT

Cameron Giles a/k/a Cam'Ron , LaRon Louis James NIKE.139797 BTW

Total Fees Due	\$38,337.50
Total Expenses	\$1,316.81
TOTAL AMOUNT DUE	\$39,654.31 =====

SHOOK, HARDY & BACON L.L.P.
Attorneys At Law
2555 Grand Boulevard
Kansas City, Missouri 64108-2613

Federal I.D.: 44-0585497

January 30, 2009

NIKE INC
ONE BOWERMAN DR
BEAVERTON OR 97005-0979

Invoice: 1440815

(816) 474-6550

Cameron Giles a/k/a Cam'Ron , LaRon Louis James
a/k/a Jueiz Santana

NIKE.139797 BTW

For Professional Services Rendered through 12/31/08

HOURS

12/01/08 JSK	Review and analyze contract between Diplomatic Man and IDJ regarding Juelz Santana. Review Plaintiff's responsive pleading to Nike's, statement in response. Telephone call with local counsel to discuss procedure for adjourning Friday's hearing.	2.50
12/01/08 BALX	Review and analyze Plaintiff's counsel's Reply Affidavit in support of motion to withdraw; conferences with Ms. Riggs and Mr. Seitz regarding same.	.50
12/02/08 JSK	Review Cinque's submission to court and draft letter in response to the court. Communication with local counsel regarding letter to the court and appropriate local procedures.	2.90
12/02/08 APS	Review and analyze filing by Mr. Cinque regarding hearing on motion to withdraw; review response regarding same.	1.10

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12/02/08 BALX	Review and analyze letter from Mr. Cinque to the Court requesting adjournment of the case management conference without date; communicate with Mr. Riggs, Mr. Seitz and Mr. Beil regarding strategy for responding to letter; review and analyze draft of response letter and communicate with Ms. Riggs and Mr. Seitz regarding suggested revisions to same.	.80
12/02/08 MDDX	Review and update Nike's Privilege Log in preparation for possible production to opposing counsel.	1.50
12/04/08 BTW	Conference with Mr. Seitz regarding strategy for new counsel and ownership issues; review briefing regarding withdrawal.	1.10
12/04/08 BALX	Review and analyze documents received from ASCAP in response to subpoena duces tecum.	.40
12/04/08 BALX	Review communications from counsel for Sound Exchange requesting extension and raising questions regarding compliance with subpoena.	.20
12/04/08 BALX	Review correspondence from counsel for Universal Music Group and Island Def Jam regarding supplementation of its document production, including the requested option exercise letter.	.20
12/04/08 BALX	Correspond with, and review correspondence from, Mr. Beil regarding adjournment status of 12/5/08 case management conference.	.30
12/04/08 MDDX	Review and analyze documents prepared for production to opposing counsel and update document log in preparation for attorney review.	5.50
12/05/08 APS	Correspondence with Mr. Beil regarding motion to withdraw and Court's Order regarding same; correspondence with Ms. Davis regarding REDACTED	.90
12/05/08 BALX	Communicate with counsel for SoundExchange regarding agreement to extend time for complying with subpoena and regarding his questions arising from compliance.	.20

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12/08/08 BALX	Review and analyze supplemental documents received from Universal Music Group and Island Def Jam; correspond with Mr. Seitz and Ms. Riggs regarding receipt of the option exercise letter establishing that the Juelz Santana Recording Agreement was in effect at the time The Second Coming was created and thus Diplomatic Man has no standing to sue for copyright infringement; conference with Mr. Seitz regarding emails between Mr. Cinque and Universal Music Group attorney Harvey Gellar disputing Diplomatic Man's rights in master recording of The Second Coming.	1.70
12/08/08 BALX	Communicate with counsel for Sound Exchange regarding his questions about compliance with subpoena.	.20
12/09/08 BTW	Study withdrawal papers; conference with Mr. Seitz regarding strategy for hearing on same.	1.40
12/10/08 BALX	Telephone conference with counsel for Sound Exchange regarding its production of documents in compliance with subpoena.	.30
12/10/08 MDDX	Review and analyze third party document production and prepare copies for hearing per the request of Mr. Seitz.	5.00
12/11/08 BTW	Multiple conference with Mr. Seitz regarding hearing and dismissal issues.	.70
12/11/08 JSK	Correspondence within team regarding status conference hearing and arguments to be presented to judge on Diplomatic Man contract with IDJ; Review Diplomatic Man contract with IDJ.	2.10
12/11/08 APS	Prepare for hearing on motion to dismiss; review and analyze recent discovery from Universal/Def Jam; review and analyze transcripts from previous litigation involving Cam'Ron; review and analyze contracts between Cam'Ron, Juelz, and Universal; review and analyze correspondence between Def Jam and Mr. Cinque regarding ownership of copyright.	7.50

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12/11/08 RSRZ	Gather production specifications, manage document production from legal document database, QC final production media, images and load files.	.50
12/11/08 KKW	Coordinate processing of production. Coordinate addition of documents to database.	1.20
12/11/08 JKHY	Produce documents and images identified by K. Crumley from the Diplomatic Man v Nike Concordance database and convert to PDF.	1.50
12/12/08 BTW	Conference with Mr. Seitz regarding hearing and dismissal.	.60
12/12/08 APS	Prepare for and attend hearing on motion to dismiss; telephone conference and correspondence with Ms. Davis regarding REDACTED	3.50
12/12/08 BALX	Telephone conference with Mr. Seitz regarding dismissal of case due to Plaintiff's failure to appear at conference and failure to prosecute; communicate with Ms. Riggs regarding same.	.20
12/12/08 BALX	Research and analyze whether dismissal for failure to prosecute is a judgment on the merits, Nike's status as a prevailing party for purposes of awarding attorney's fees, and factors considered by courts in awarding attorney's fees; draft memorandum summarizing research findings.	2.50
12/15/08 BTW	Conference with Mr. Seitz regarding fees issue; conference with client regarding REDACTED	1.10
12/15/08 JSK	Research and review case law regarding motion for costs. Discuss potential motion with team. Review Order from Court. Review e-mail from local counsel regarding motion for costs and typo in Court's Order.	1.50
12/15/08 APS	Begin working on motion for fees; meeting with Ms. Larigan regarding same; correspondence with Ms. Davis regarding REDACTED	2.00

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12/15/08 BALX	Conference with Mr. Seitz regarding timing for filing motion for costs and fees; draft outline for motion for fees; review Court's order dismissing case and confer with Mr. Beil regarding incorrect date on order and correction of date for purposes of docketing deadline for filing a motion for fees.	2.80
12/17/08 BTW	Prepare for conference with client; review caselaw regarding fees in SDNY; conference with team; conference with client regarding REDACTED	1.80
12/18/08 BALX	Begin drafting motion for costs and attorney's fees.	3.00
12/19/08 CAGZ	Perform research relating to supporting declarations for a motion for attorney's fees; research case law regarding an award of attorney's fees in a case dismissed under Rule 41(b); begin drafting attorney declaration.	6.20
12/19/08 APS	Work on motion for fees; telephone conference with Ms. Davis regarding REDACTED	2.50
12/19/08 BALX	Continue drafting motion for costs and attorney's fees; multiple conferences with Mr. Seitz and Ms. Guastello regarding motion for fees; correspond with Mr. Beil regarding attachments to motion for fees.	7.10
12/20/08 CAGZ	Finish drafting attorney declaration; finish researching case law re: reasonableness; draft reasonableness of attorney's fees section of motion for fees.	3.90
12/20/08 BALX	Review and revise draft of Declaration of B. Trent Webb in support of motion for attorney's fees; correspond with Ms. Guastello regarding revisions.	.30
12/21/08 CAGZ	Research and draft background feud portion of motion for attorney's fees.	4.10
12/21/08 BALX	Continue drafting motion for costs and attorney's fees.	.50
12/22/08 CAGZ	Make edits to Webb declaration; begin drafting Beil declaration; draft billing exhibits; research award of attorney's fees in cases dismissed for failure to prosecute.	4.90

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12/22/08 BALX	Continue drafting motion for costs and attorney's fees; multiple conferences with Mr. Seitz and Ms. Guastello regarding motion.	9.90
12/22/08 BALX	Telephone conference with Mr. Beil regarding motion for attorney's fees and the necessary records and declaration in support.	.20
12/22/08 MDDX	Review and prepare exhibits for Nike's Motion for Attorneys fees per the request of and in preparation for review by Ms. Larigan.	3.50
12/23/08 BTW	Work on motion for attorneys fees; multiple attorney conference regarding same.	1.20
12/23/08 CAGZ	Research page limitations for motion for attorney's fees; research supporting articles for feud portion of motion for attorney's fees; finish drafting Beil declaration.	4.10
12/23/08 APS	Work on motion for fees and costs; correspondence with Ms. Davis regarding REDACTED	3.50
12/23/08 BALX	Continue drafting motion for costs and attorney's fees; multiple conferences with Mr. Seitz and Ms. Guastello regarding motion; revise declarations of B. Trent Webb and Marshall Beil in support of motion for fees; send draft declarations to Mr. Beil for his review and revision.	5.00
12/23/08 MDDX	Review and prepare exhibits for Nike's Motion for Attorneys fees per the request of and in preparation for review by Ms. Larigan.	4.00
12/24/08 CAGZ	Research additional aspects of feud between Cam'ron and Santana.	2.10
12/24/08 BALX	Correspond with Mr. Beil regarding a notice of motion and his declaration in support of the motion for attorney's fees; review drafts of the notice of motion and Mr. Beil's declaration.	.40
12/24/08 MDDX	Draft and edit Notice of Motion and prepare exhibits for filing in the Southern District of New York per the request of Ms. Larigan.	1.00
12/26/08 APS	Work on motion for fees and costs.	1.30

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12/27/08	CAGZ	Review final version of motion for attorney's fees for accuracy and make additional edits.	1.90
12/27/08	APS	Work on motion for fees and costs; correspondence with Ms. Davis regarding REDACTED	5.00
12/28/08	APS	Work on motion for fees and costs.	1.50
12/28/08	BALX	Revise motion for costs and attorney's fees; begin researching redaction of time entries in a motion for fees to preserve work product and attorney-client privilege.	2.20
12/29/08	APS	Finalize and file motion for fees and costs.	2.50
12/29/08	BALX	Continue research regarding redaction of time entries in a motion for fees and communicate with Mr. Seitz and Ms. Deaton regarding redaction; prepare exhibits in support of Nike's motion for costs and attorney's fees against Plaintiff Diplomatic Man, Inc; draft and file motion to seal certain exhibits in support of motion for costs and attorney's fees; finalize Nike's motion for costs and attorney's fees, memorandum of law in support of same, declaration of Beth Ann Larigan in support of motion, and declarations of B. Trent Webb and Marshall Beil attaching billing records supporting motion; work with Mr. Beil to finalize and file same.	9.80
12/29/08	MDDX	Review and analyze motion/memorandum for attorney's fees and prepare exhibits in anticipation of filing by local counsel per the request of Ms. Larigan.	6.50
12/29/08	MMR	Cite check pleading for Ms. Larigan.	1.50
12/29/08	KKW	Coordinate processing of production.	1.70
12/30/08	BALX	Correspond with Mr. Beil regarding status of filings related to motion for fees and motion to seal; review filings re-submitted to Court separately per ECF clerk's instructions; correspond with Mr. Beil regarding news that Court has granted the Motion to Seal.	.30

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NIKE INC
FILE NUMBER: NIKE.139797
INVOICE NO.: 1440815

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12/31/08 BALX Review Court's order granting Motion to Seal. .10

Mr. Webb	7.90 hours at	\$470.00 =	3713.00
Ms. Guastello	27.20 hours at	\$235.00 =	6392.00
Ms. Knapp Riggs	9.00 hours at	\$275.00 =	2475.00
Mr. Seitz	31.30 hours at	\$290.00 =	9077.00
Ms. Larigan	49.10 hours at	\$240.00 =	11784.00
Ms. Deaton	27.00 hours at	\$155.00 =	4185.00
Mr. McReynolds	1.50 hours at	\$95.00 =	142.50
Mr. Reeves	0.50 hours at	\$140.00 =	70.00
Ms. Crumley	2.90 hours at	\$110.00 =	319.00
Mr. Hesse	1.50 hours at	\$120.00 =	180.00

Total Fees Due

\$38,337.50

EXPENSES

12/16/08 Adam Seitz: parking, cabs, New York, NY, 12/12/08	80.90
12/16/08 VENDOR: Adam Seitz: meals, New York, NY, 12/12/08	17.00
11/25/08 Imaging Services	35.00
12/11/08 Imaging Services	14.00
12/29/08 Long Distance Beth Larigan to 2125487004	3.15
12/29/08 Long Distance Beth Larigan to 2125487004	1.75
12/29/08 Long Distance Beth Larigan to 2125487004	2.45
12/29/08 Long Distance Beth Larigan to 2125487004	1.75
11/18/08 Delivery--Federal Express	15.02
11/19/08 Delivery--Federal Express	15.02
12/29/08 Lexis Legal Research (No charge)	NO CHARGE
11/28/08 Pacer (No charge)	NO CHARGE
12/31/08 Short's Travel Service -- Mr. Seitz to New York, NY and return, 12/11-12/08	1130.77

Total Expenses

\$1,316.81

TOTAL AMOUNT DUE

\$39,654.31
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